

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

MICHAEL T. DREHER,
*Individually and on behalf of a
class of similarly situated persons,*

Plaintiff,

v.

CIVIL NO. 3:13-cv-00140-JAG

ATLANTIC REMODELING CORP.

Defendants.

PLAINTIFF'S THIRD SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES

COMES NOW the Plaintiff, MICHAEL T. DREHER, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following Supplemental Disclosures to Defendant. These supplemental disclosures are based on information reasonably available to the Plaintiff at this time. Plaintiff reserves the right to further supplement these disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these supplemental disclosures, Plaintiff does not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiff also does not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

II. Description of documents in possession of the Plaintiff.

Other than those documents obtained from any Defendant in discovery, if applicable, the Plaintiff has the following supplemental documents in his possession and control:

Plaintiff's Bate Stamp Nos. 000014 – 000074 – *Documents produced with Plaintiff's responses to Defendant's Requests for Production of Documents served on July 15, 2013 – previously forwarded to Defendant's Counsel under separate cover.*

Plaintiff reserves the right to further supplement these disclosures.

MICHAEL T. DREHER,
*Individually and on behalf of a
class of similarly situated persons*

/s/

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th of August, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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